

EXHIBIT 9

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
EASTERN DIVISION – RIVERSIDE**

STEPHENSON AWAH TENENG,
MARCEL NGWA, ANKUSH KUMAR,
GURJINDER SINGH, ATINDER PAUL
SINGH, NOE MAURICIO GRANADOS
AQUINO, and all others similarly situated,

Plaintiffs,

v.

DONALD J. TRUMP, President of the
United States,
KIRSTJEN NIELSEN, Secretary
Department of Homeland Security;
RONALD D. VITIELLO, Acting Director,
Immigration and Customs Enforcement;
DAVID MARIN, Field Office Director, Los
Angeles Field Office of Immigration and
Customs Enforcement;
JEFFERSON BEAUREGARD SESSIONS,
III, U.S. Attorney General;
HUGH J. HURWITZ, Acting Director,
Federal Bureau of Prisons,
DAVID SHINN, Warden, FCI Victorville
Medium Security Prison I/II, in their official
capacities only,

Defendants.

Case Number:

5:18-cv-01609-JGB-KK

**DECLARATION OF
MUNMEETH KAUR SONI**

I, Munmeeth Kaur Soni, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am over 18 years of age and am competent to make this Declaration.
2. I am the Co-Legal Director at Immigrant Defenders Law Center in

Los Angeles, California.

3. I am fluent in Punjabi, Hindi, Spanish, and English.

4. I am a lifelong adherent of the Sikh faith and, therefore, am personally aware of Sikh religious beliefs and practices.

5. In connection with my position as Co-Legal Director at Immigrant Defenders Law Center, I have conducted at least ten “Know Your Rights” trainings for civil immigrant detainees at the Federal Correctional Center in Victorville, California. I conducted my first training in July of 2018 and my most recent training on September 4, 2018.

6. During the trainings, I inform detainees, in Punjabi, about their due process rights in relation to their immigration proceedings, their rights to adequate medical and mental health care, and ongoing litigation about these rights. The trainings I provide are directed primarily toward detainees from South Asian countries. Through the course of these trainings, I have interacted with over 500 detainees, most of whom speak Punjabi.

7. Most of the Punjabi-speaking detainees I have interacted with are practicing Sikhs, and many of them have asked me during presentations about religious accommodations that would enable them to practice their Sikh faith.

8. One question that has come up repeatedly pertains to whether and when the detainees will be able to obtain turbans or other head coverings. As a

practicing Sikh myself, I am well aware that, for many Sikh men, wearing a turban is an integral part of their religious practice. It symbolizes devotion to God. In particular, for Sikh men who maintain unshorn hair as part of their religious practice, covering their hair with a turban is required, and being forced to go without a turban is shameful and a serious violation of their religious beliefs.

9. In response to the detainees' repeated questions about turbans and head coverings, I have asked those in attendance at my presentations to raise their hands if they needed one. During my presentations, alone, at least 60 detainees have indicated that they needed a turban or head covering. Outside of my presentations, I also have personally observed over 30 detainees who have unshorn (never cut) hair, without turbans, at Victorville.

10. Until two weeks ago, I never saw any detainee at Victorville wear a turban or other head covering. On more recent visits, some detainees have had turbans. However, other Sikh detainees continue to inquire during my presentations about obtaining turbans or head coverings. Although detainees are now allowed to purchase turbans from the prison commissary, they inform me that the commissary is only open on Mondays. In addition, commissary hours are often cancelled without any notice. Thus, if a detainee arrives after Monday's commissary hours, he has to go for a week or more without a turban,

11. Many of the Sikh detainees cannot afford the \$10 charged by the

commissary for turbans because they have no money on their prison accounts and no family or friends outside of the prison who can help financially. Some of the indigent men were open to my offer to donate money to their accounts so they could purchase a turban or head covering. However, I have had difficulty identifying their prison account numbers or current locations.

12. During my presentations at Victorville, several detainees who were visibly ill were in attendance. I once saw a BOP custodial official tell friends of a visibly ill detainee that ICE was picking him up to send him back home. The BOP staff was gruff with the detainees who asked after their friend.

13. I also have visited ICE's detention facility in Adelanto, California.

14. On August 9, 2018, I attended a worship service held for Sikh men at the detention center. During the service, which was held in the facility's chapel, there appears to be approximately 170 detainees in attendance. The service was led by a local Sikh priest whom I personally know.

15. During the worship service, I saw former detainees from Victorville, whom I recognized by their faces. Many were wearing turbans or head coverings at this religious service, as were many of the other men in attendance.

16. Before, during, and after the worship service, I did not witness any apparent security problems. The men gathered peacefully and were well-behaved throughout the service and thereafter.

17. While at Adelanto, I also saw a bookshelf filled with different kinds religious texts, including Bibles, the Quran, and multiple Sikh texts that were properly kept in accordance with Sikh religious mandates. These included religious texts in languages other than English.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Munmeeth Kaur Soni

Executed this 4th day of September, 2018